IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

| ePLUS INC., |) |
|------------------------|----------------------------|
| Plaintiff, |) |
| |) |
| V. |) Case No. 3:09CV620 (REP) |
| LAWSON SOFTWARE, INC., |) |
| |) |
| |) |
| Defendant. |) |

<u>DEFENDANT'S NOTICE OF FILING MEMORANDUM IN OPPOSITION TO PLAINTIFF EPLUS, INC.'S MOTION TO ENFORCE COURT'S ORDER OF FEBRUARY 21, 2012</u>

PLEASE TAKE NOTICE that, pursuant to the Protective Order entered in this case,

Defendant Lawson Software, Inc. ("Lawson") has filed the following documents **Under Seal:**

Defendant Lawson Software, Inc.'s Memorandum in Opposition to Plaintiff
ePlus, Inc's Motion to Enforce Court's Order of February 21, 2012, Compelling
Production of Documents and Finding Waiver of Attorney-Client Privilege, and
for Sanctions, with exhibits.

| LAWSON SOFTWARE, INC. | |
|-----------------------|------------|
| By: _ | /s/ |
| - | Of Counsel |

Dabney J. Carr, IV, VSB #28679 Robert A. Angle, VSB #37691 **TROUTMAN SANDERS LLP** P. O. Box 1122

Richmond, Virginia 23218-1122 Telephone: (804) 697-1200 Facsimile: (804) 697-1339

dabney.carr@troutmansanders.com robert.angle@troutmansanders.com

Josh A. Krevitt (admitted *pro hac vice*)
Daniel J. Thomasch (admitted *pro hac vice*)
Christopher D. Dusseault (admitted *pro hac vice*)
Jason C. Lo (admitted *pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue

New York, NY 10166-0193 Telephone: (212) 351-4000 Facsimile: (212) 351-4035

Counsel for Defendant Lawson Software, Inc.

CERTIFICATE OF SERVICE

I certify that on this 28th day of September, 2012, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Paul W. Jacobs, II
Henry I. Willett, III
CHRISTIAN & BARTON, LLP
909 East Main Street, Suite 1200
Richmond, Virginia 23219-3095
cmerritt@cblaw.com
pjacobs@cblaw.com
hwillett@cblaw.com

Craig T. Merritt

Scott L. Robertson
Jennifer A. Albert
David M. Young (VSB No. 35997)
Goodwin Procter, LLP
901 New York Avenue, N.W.
Washington, DC 20001
srobertson@goodwinprocter.com
jalbert@goodwinprocter.com
dyoung@goodwinprocter.com

Attorneys for Plaintiff

Michael G. Strapp Goodwin Procter, LLP Exchange Place 53 State Street Boston, MA 02109-2881 mstrapp@goodwinprocter.com

/s/

Dabney J. Carr, IV (VSB No. 28679) Robert A. Angle (VSB No. 37691) Megan C. Rahman (VSB No. 42678) dabney.carr@troutmansanders.com robert.angle@troutmansanders.com megan.rahman@troutmansanders.com

TROUTMAN SANDERS LLP

1001 Haxall Point Richmond, VA 23219 Telephone: (804) 697-1200 Facsimile: (804) 697-1339

Counsel for Defendant Lawson Software, Inc.